



United States Department of Justice

United States Attorney
Northern District of New York

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April 4, 2025

Hon. Daniel J. Stewart
U.S. Magistrate Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 314
Albany, New York 12207

Re: *Real Property Commonly Known as 600 Linkhorn Drive, Virginia Beach, VA 23541, et al.*, Civil Action No. 1:24-cv-1345 (MAD/DJS)

Dear Judge Stewart:

The United States wishes to advise the Court that it has personally served the owner of the Defendant Real Property, Mr. Kris Roglieri, with notice of the *ex parte* Warrant for Seizure of Real Property issued by the Court on March 31, 2025 (Dkt. No. 43). Moreover, the Defendant Property has been taken into the custody and protection of the United States Marshal's Service. The process receipts for notice and seizure have been filed with Court. Dkt. No's. 44, 45.

Accordingly, the government respectfully requests that the Court schedule a post-seizure hearing wherein the property owner shall have the opportunity, if so desired, to contest the basis for the seizure of the Defendant Real Property.

Respectfully submitted,

JOHN A. SARCONI III
United States Attorney

By: /s/ Elizabeth A. Conger
Elizabeth A. Conger
Assistant United States Attorney
Bar Roll No. 520872

cc: Kris Roglieri, by certified mail, return-receipt requested.